

I'm sending this as a private citizen, but one who has had experience with broadcasting for most of my life of 65 years.

I have been reviewing MB Docket No. 04-233, dealing with Broadcast Localism, and have some real problems with the large number of proposed rules that are supposed to increase local input into programming decisions.

First, I do realize that economics and relaxed ownership rules by the FCC have resulted in the same ownership of multiple stations, even in the same market. In Milwaukee there are several such combinations. The same concerns have also increased satellite distribution of programming, while technology has increased the reliability of broadcast equipment, as well as the ability to monitor and adjust the equipment from remote locations.

This remote control, of course, takes place whether the monitoring control point is a few blocks or miles from the transmitter, or whether it is in a different state. With the addition of on-call local engineers, the result is the same.

In terms of programming, most of these stations depend on advertising, including local advertising, to support their operations, so if local people are not being served, ratings will drop, and advertisers will find another way to reach people with their messages.

The multiple stations owned by these groups are not carbon copies of each other. If they were, there would be no reason for a group owner to have all those stations. Their formats range from a variety of music genres to news-talk formats, some with both local and national programs.

The talk programs, in particular, provide multiple opportunities for local people to call in and express their views and concerns, so there is a continuous flow of input from the community. This is true even if the program is regional or national in distribution.

In larger markets, especially, no one group owns all the available

outlets, so there is competition between groups in addition to the local influence on individual stations within a group. So there is a real race to serve the most local listeners in order to get the highest ratings, and thus the highest ad revenue.

In Milwaukee, where I live, there are a number of competing stations owned by various entities that are competing head-to-head with the same format, including news and information, and talk radio. Several have many local hosts that regularly cover local issues in a way that elicits local response.

The moves to digital transmissions also are increasing the diversity of local programming. Digital television is already providing more channels which are being customized to reach the interests of specific areas of the community. Now digital radio promises to do the same thing.

So we already have a choice of 11 full-power TV stations multiplying to a potential of 55 channels on DTV, plus 2 low-power TV stations, both of which are also going digital; plus 20 local FM stations and 10 more from just outside the metro area; plus 12 AM stations and 6 more from just outside the metro area (some of which are already providing digital program channels), not to mention several high power AM stations from Chicago that have strong signals in Milwaukee. I often hear Milwaukee calls on their talk programs.

That gives us up to 123 choices for programming (not counting added digital radio channels)! Hmm... Looks like our area already has program diversity and a variety of locally-oriented programming, including many specialty stations, some in Spanish full-time, and others providing programming in German, Polish, and other languages part time.

All this has come because the FCC has allowed such diversity to flourish, and the marketplace has ensured that there is a diverse selection of programming, and also that the community (actually multiple sub-groups in the community) also has the ability to influence the programming as part of the free marketplace of ideas.

I fail to see how requirements--such as having a local community advisory board telling every station what they should be broadcasting, or requiring every station to include all sides of every issue (to mention just two parts of the proposed rules) will increase service to the community. Most likely it will reduce the number of issues discussed, in order to avoid challenges from those who feel their viewpoint was not represented adequately on that station's programs.

In some cases, stations that are now serving unique segments of the community would be forced to cut back on that service so they can "balance" their programming. Ultimately, the result would be 123-plus channels that would be indistinguishable except for their music playlists--and for most stations, music playlists would be all they would offer. Some broadcasters, I'm sure, would give up entirely and shut down or sell (if they can) to another owner who will face the same obstacle course of requirements just to exist on the dial.

No, as is true in most areas of American society, and proven throughout our history because our country was set up to provide equal opportunity for all, the marketplace will sort out the ideas the community really wants to be included (not some group set up to represent the community in theory).

But what about small markets? I enjoy tuning to local stations as I travel to get the "flavor" of different areas. My experience in listening to local stations in smaller communities is that they are diligent to serve that community, both in the information they provide, and in the programs they include on their schedule. Their budgets are small in most cases, so they don't have the polished production of most stations in larger markets, but that just makes them fallible human neighbors to their listeners, and there becomes a camaraderie and interplay between broadcasters and listeners. In addition, many specialize in remote broadcasts in the community, from high school sports, to community events like fairs, ethnic celebrations, etc.

So my recommendation is to forget the 04-233 proposals, and instead make sure that all these ideas and formats can continue in a

marketplace where other ideas and formats can also be developed by citizens of the community if desired, with a minimum of technical infractions or interference with each other.